

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PREFERRED GROUP OF MANHATTAN, INC., :  
:  
Plaintiff, :  
- against - : Index No. 09 Civ. 4981  
: (VLB-PED)  
ROBERT J. DOOLEY and CORNELIUS R. :  
VERHOEST, :  
: **NOTICE OF MOTION**  
Defendants. :  
:-----X

**PLEASE TAKE NOTICE**, that upon the annexed Declaration of Kenneth S. Yudell, Esq., dated October 15, 2012, and the exhibits annexed thereto; and upon the accompanying Memorandum of Law; and upon all of the proceedings heretofore had herein, Aronauer, Re & Yudell, LLP ("ARY") and Kenneth S. Yudell, Esq. ("Yudell") will move this Court, before the Honorable Paul E. Davison at the Courthouse located at The Hon. Charles L. Brieant Jr. Federal Building and Courthouse, Southern District of New York, 300 Quarropas Street, White Plains, New York 10601-4150, for an order as follows:

1. permitting ARY and Yudell to withdraw as counsel to Plaintiff in accordance with Local Civil Rule 1.4;
2. granting ARY and Yudell a charging lien in the amount of \$56,949;
3. staying this action for no less than thirty (30) days from entry of an order permitting ARY and Yudell to withdraw

as counsel in order to permit Plaintiff sufficient time to engage new counsel; and

4. granting ARY and Yudell such other, further and different relief as to this Court seems just, proper and equitable.

**PLEASE TAKE FURTHER NOTICE** that answering papers, if any, are to be served on or before October 29, 2012, in accordance with the prior Order of this Court

Dated: October 15, 2012  
New York, New York

ARONAUER, RE & YUDELL, LLP

By: /s/Kenneth S. Yudell  
Kenneth S. Yudell (KY-3259),  
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